

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FIRST INTERIM POST-DISMISSAL FEE APPLICATION
COVER SHEET FOR THE PERIOD
AUGUST 12, 2023 THROUGH MARCH 31, 2024

Debtor: LTL Management LLC Applicant: Brown Rudnick LLP
Case No.: 23-12585 (MBK) Client: Official Comm of Tak Claimants
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

☒ Interim Post-Dismissal Fee Application No. 1 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from August 12, 2023 through March 31, 2024
(the "First Interim Post-Dismissal Fee Application")

Total Fees: \$1,144,783.50
Total Disbursements: \$95,774.77
20% Holdback (First Through Fourth Post-Dismissal Fee Statements): \$228,956.70

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
David J. Molton	Partner 1983	107.2	\$1,950/\$2,250	\$220,920.00
Jeffrey L. Jonas	Partner 1988	34.2	\$1,950/\$2,250	\$66,450.00
Michael S. Winograd	Partner 2001	366.3	\$1,280/\$1,800	\$556,744.00
Sunni P. Beville	Partner 2002	73.2	\$1,390/\$1,800	\$104,659.00
Cathrine M. Castaldi	Partner 1991	.1	\$1,390	\$139.00
Susan Sieger-Grimm	Counsel 1994	126.3	\$1,055/\$1,200	\$137,886.50
Gerard T. Cicero	Partner 2015	7.8	\$1,000	\$7,800.00
Michael W. Reining	Associate 2015	29.7	\$890/\$975	\$28,493.50

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
Matthew A. Sawyer	Associate 2019	4.3	\$950	\$4,085.00
Alexander F. Kasnetz	Associate 2018	9.6	\$890/\$950	\$8,574.00
Isabelle R. Jacobs	Associate 2018	2.1	\$890	\$1,869.00
David Weinstein	Associate 2020	2.5	\$695	\$1,737.50
Harriet E. Cohen	Paralegal	10.9	\$490/\$500	\$5,426.00
TOTALS		774.2		\$1,144,783.50

Fee Totals: \$1,144,783.50

Disbursements Totals: \$95,774.77

Total Fee Application \$1,240,558.27

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	74.3	\$96,834.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation General litigation and other contested matters.	523.1	\$817,671.50
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings.	171.2	\$221,810.50
m) Plan and Disclosure Statement Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals.	.1	\$95.50
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by laws and addressing other governance matters.	1.9	\$1,860.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
bb) Dismissal / Trustee / Examiner Matters Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
cc) Meetings of Co-Counsel Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings.	3.6	\$6,512.00
SERVICE TOTALS:	774.2	\$1,144,783.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$858.02
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$21,809.33
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$71.70
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$645.00
g) Outside Reproduction Services Including scanning services.	\$0.00
h) Other Research Title searches, UCC searches, Asset searches, Accurant.	\$0.00
i) Court Reporting Deposition Services / Transcripts	\$0.00
j) Travel Mileage, tolls, airfare, parking.	\$1,675.88
k) Courier & Express Carriers Overnight and personal delivery.	\$135.65
l) Postage	\$14.32
m) Other (specify) Meals Meals.	\$641.52
n) Other (specify) Expert and Professional Fees.	\$69,370.85
o) Other (specify) Third Party Hosting.	\$252.50
p) Other (specify) eDiscovery Hosting.	\$300.00
DISBURSEMENTS TOTAL:	\$95,774.77

I certify under penalty of perjury that the foregoing is true.

Date: April 29, 2024

/s/ Gerard T. Cicero